

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY  
NEWARK DIVISION

In re	:	Chapter 11
	:	
DEL DWAIN HOWARD ALLISON and	:	Case No. 21-13459/JKS
DONNA MARIE ALLISON,	:	
	:	OBJECTION TO APPLICATION TO
Debtors.	:	EXTEND TIME TO FILE MISSING
	:	SCHEDULES

OBJECTION OF JAMES J. BROWN, JR  
TO DEBTORS APPLICATION TO EXTEND TIME TO FILE MISSING SCHEDULES

1. I am counsel to secured creditor James J. Brown, Jr. A secured claim has been filed on Mr. Brown's behalf in the total amount of \$564,918.08. This is Mr. Brown's OBJECTION to the Debtors Application to Extend Time to File Missing Schedules,

2. Debtors application is solely by counsel. There is no supporting certification from the Debtors and no legal brief submitted.

3. Debtors' counsel uses appropriate "buzz" words, emergent, significant progress, complexity of the case & etc. but there is no substance. To say that this was an emergent filing is exaggeration. James J. Brown, Jr. was in settlement negotiations with the Debtors for many months before the filing and bankruptcy counsel was consulted by the Debtors in that process.

4. This is a residential one asset Chapter 11 case in which Debtors have elected Subchapter V. In doing so Debtors and counsel are aware of the accelerated timer frames

involved. There is simply no substantive reason presented to extend time for follow up Schedules.

5. The application should be denied and the case dismissed.

RAGAN & RAGAN, PC

*Attorney for Creditor James J. Brown, Jr.*

Dated: May 18, 2021

By: /s/ W. Peter Ragan, Sr.  
W. PETER RAGAN, SR., ESQ.